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BEFORE THE ARIZONA CORPORATION COMMISSION

COMMISSIONERS

GARY PIERCE, Chairman
BOB STUMP
SANDRA D. KENNEDY
PAUL NEWMAN
BRENDA BURNS

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AZ CORP COMMISSION
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Arizona Corporation Commission

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DOCKET NO. E-01750A-11-0136

IN THE MATTER OF THE APPLICATION OF
MOHAVE ELECTRIC COOPERATIVE,
INCORPORATED, AN ELECTRIC
COOPERATIVE NONPROFIT MEMBERSHIP
CORPORATION, FOR A DETERMINATION OF
THE FAIR VALUE OF ITS PROPERTY FOR
RATEMAKING PURPOSES, TO FIX A JUST
AND REASONABLE RETURN THEREON AND
TO APPROVE RATES DESIGNED TO
DEVELOP SUCH RETURN.

**STAFF'S REQUEST FOR EXTENSION
OF TIME TO FILE TESTIMONY AND
FOR WAIVER OF TIME CLOCK**

On March 30, 2011, Mohave Electric Cooperative, Inc. ("Mohave" or "Cooperative") filed its application for a determination by the Arizona Corporation Commission ("Commission") of the fair value of its property for ratemaking purposes, to fix a just and reasonable return thereon and to approve rates designed to develop such return.

On June 27, 2011, the Commission's Utilities Division ("Staff") filed its Letter of Sufficiency indicating that Mohave's application satisfied the requirements of Arizona Administrative Code ("A.A.C.") R14-2-103 and classifying the Company as a Class A utility.

On June 27, 2011, Staff filed a Proposed Procedural Schedule for Filing Dates.

On July 1, 2011, Staff filed a Revised Proposed Schedule for Filing Dates which recommended a compressed schedule compared to the original proposed schedule.

On July 6, 2011, Mohave filed a Response to Staff's Revised Proposed Schedule for Filing Dates. The Company indicated that it supports Staff's proposed revised schedule.

On July 15, 2011, the Hearing Division issued its Procedural Order which set the following schedule for the filing of testimony, the pre-hearing conference and the hearing, as follows:

Staff Report and/or Direct Testimony except Cost of Service and Rate Design	November 30, 2011
Intervenor Direct Testimony except Cost of Service and Rate Design	November 30, 2011
Staff Direct Testimony Cost of Service and Rate Design	December 19, 2011

Intervenor Direct Testimony Cost of Service and Rate Design	December 19, 2011
Mohave Rebuttal Testimony	January 18, 2012
Staff Surrebuttal Testimony	February 8, 2012
Intervenor Surrebuttal Testimony	February 8, 2012
Mohave Rejoinder Testimony	February 29, 2012
Pre-Hearing Conference	March 16, 2012
Hearing	March 19, 2012

Staff is unable to submit its Direct Testimony due on November 30, 2011, for the reason that the information required from the Company for Staff to prepare its testimony has not been provided either timely or with sufficient thoroughness. The Company sought and received from Staff an extension of time to respond to Staff's Data Requests. Staff noted at that time that such a delay could result in a delay in the entire rate case schedule. The Company acknowledged this possibility, but indicated it would be addressed in the future should the necessity arise.

When those responses were received, they were insufficient and required additional information, including Staff's Fourth and Seventh Data Requests. As of this date, Staff still has not received sufficient information regarding purchased power expenses. Without that information, Staff's Consultant, Jerry Mendl, is unable to complete his analysis, which is essential to Staff's witnesses in the preparation of their Direct Testimony.

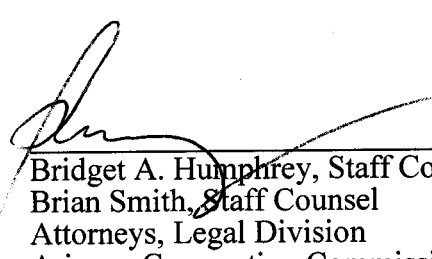
Staff requests that its deadline for filing its direct testimony and exhibits be extended by at least 45 days; that the schedule set forth in the Procedural Order of July 15, 2011, be adjusted accordingly, including the rescheduling of the hearing dates; and that the time clock be waived until such time as the Company has provided its complete responses to Staff's Data Requests. Specifically, the proposed schedule is:

Staff Report and/or Direct Testimony except Cost of Service and Rate Design	January 13, 2012
Intervenor Direct Testimony except Cost of Service and Rate Design	January 13, 2012
Staff Direct Testimony Cost of Service and Rate Design	February 2, 2012
Intervenor Direct Testimony Cost of Service and Rate Design	February 2, 2012
Mohave Rebuttal Testimony	March 2, 2012
Staff Surrebuttal Testimony	March 23, 2012
Intervenor Surrebuttal Testimony	March 23, 2012
Mohave Rejoinder Testimony	April 13, 2012

1	Pre-Hearing Conference	April 30, 2012
2	Hearing	May 3, 2012

3 Staff has advised the Company of its proposed extension of the schedule by forty-five days.
 4 The Company opposes Staff's request.

5 RESPECTFULLY SUBMITTED this 18th day of November, 2011.

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 11 Brian Smith, Staff Counsel
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17 Original and thirteen (13) copies
 18 of the foregoing were filed this
 19 18th day of November, 2011 with:

20 Docket Control
 21 Arizona Corporation Commission
 22 1200 West Washington Street
 23 Phoenix, Arizona 85007

24 Copies of the foregoing were mailed
 25 this 18th day of November, 2011 to:

26 Michael A. Curtis
 27 William P. Sullivan
 28 Melissa A. Parham
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